

In the matter of RM-10352  
OPPOSITION to request for Rulemaking

To the Commissioners:

As I examine the accumulated Comments by supporters filed thus far, there are many people who use the fact CW sub-bands exist on other bands as a basis for their support.

This doesn't make sense.

The International Communications Union has proposed to drop CW/Morse Code in their next meeting. So why set aside by law a large chunk of bandwidth on 160 if the mode is going away?

To my experience, I predict that if you approve this proposal 160 will eventually resemble 40 meters. There will cross-segment (split transmit and receive) work by foreign countries, taking up twice as much spectrum as single-frequency use.

Moreover, it will create the same kind of interference headaches, however inadvertant, as hams who don't know about schedules by other hams call these foreign stations on their split transmit frequency! See 40 meters to see WHAT A MESS IT ALREADY IS !

I urge you to REJECT this proposal as poorly-conceived, inadequately researched, and impossible to administer in a positive fashion.

Owen Mitchell  
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Advanced Class